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U.S.D.C. Atlanta

JUN 01 2020

JAMES N. HATTEN, Clerk  
By: *[Signature]* Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

*SANDRA B. WILLIAMS*

*PLAINTIFF*

vs.

Civil Action No. 1:20-cv-1297-TCB-JSA

*ENCORE CREDIT CORPORATION  
c/o SELECT PORTFOLIO SERVICING, et al,  
DEFENDANTS*

PLAINTIFF'S INITIAL DISCLOSURES

(1) State precisely the classification of the cause of action being filed, a brief factual outline of the case including plaintiff's contentions as to what defendant did or failed to do, and a succinct statement of the legal issues in the case.

*COMPLAINT FILED AGAINST DEFENDANTS DUE*

*TO WRONGFUL FORECLOSURE and DUAL TRACKING.*

*DEFENDANTS ADMITTED THEY AGREED NOT TO*

*FORECLOSE BECAUSE THE PARTIES AGREED TO MODIFY*

*PLAINTIFF'S LOAN.*

*THE SECURITIES ACT OF 1933 PROHIBITS DECEIT,*

*MISREPRESENTATIONS + OTHER FRAUD IN THE SALE OF*  
*SECURITIES. THE DEFENDANTS VIOLATED THE PROCEDURAL*  
*SAFEGUARDS PUT IN PLACE IN ORDER TO MAINTAIN THE*  
*INTEGRITY OF TRUST. THE SECURITIES ACT OF 1933 ITEM 1125*  
*STATES A LOAN CANNOT BE TRANSFERRED INTO A TRUST*  
*AFTER THE CLOSING DATE OR BEFORE THE DEPOSIT*  
*DATE. THIS IS AN ALLEGATION OF A PROCEDURAL VIOLATION*

(2) Describe in detail all statutes, codes, regulations, legal principles, standards and customs or usages, and illustrative case law which plaintiff contends are applicable to this action.

*SEE COMPLAINT FILED WITH*

*U.S. DISTRICT COURT NORTHERN DISTRICT*

*OF GA ATLANTA DIVISION MARCH 25, 2020*

(3) Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subjects of the information. (Attach witness list to Initial Disclosures as Attachment A.)

(4) Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in Fed.R.Civ.P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule. (Attach expert witness list and written reports to Responses to Initial Disclosures as Attachment B.)

(5) Provide a copy of, or a description by category and location of, all documents, data compilations, and tangible things in your possession, custody, or control that you may use to support your claims or defenses unless solely for impeachment, identifying the subjects of the information. (Attach document list and descriptions to Initial Disclosures as Attachment C.)

(6) In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of, or describe by category and location of, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered, making such documents or evidentiary material available for inspection and copying.

as under Fed.R.Civ.P. 34. (Attach any copies and descriptions to Initial Disclosures as Attachment D.)

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(7) Attach for inspection and copying as under Fed.R.Civ.P. 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. (Attach copy of insurance agreement to Initial Disclosures as Attachment E.)

(8) Disclose the full name, address, and telephone number of all persons or legal entities who have a subrogation interest in the cause of action set forth in plaintiffs cause of action and state the basis and extent of such interest.

• <sup>BANK</sup> U.S. NATIONAL ASSOCIATION, AS TRUSTEE, Dbo SERIES 2006-5  
CORPORATION SERVICE COMPANY  
40 TECHNOLOGY PARKWAY SOUTH SUITE 300  
NORCROSS, GA 30092

• RUBIN LUBLIN, LLC  
REGISTERED AGENT PETER LUBLIN, ESQ  
3145 AVALON RIDGE PLACE, SUITE 100  
PEACHTREE CORNERS, GA 30071

• BRET CHAMNESS, ESQ., INDIVIDUALLY c/o RUBIN LUBLIN LLC  
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